

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :
: No. 3:16-CR-319
v. :
: (Judge Caputo)
SAMUEL BORGIA and :
STEVEN BORGIA, :
Defendants :
Defendants

NONDISCLOSURE CONSENT DECREE AND ORDER

WHEREAS, counsel for the United States of America is required to disclose certain documents to the defense, pursuant to Rule 16 of the Federal Criminal Rules of Procedure, and;

WHEREAS, the documents that counsel for the United States of America intends to disclose include Pennsylvania State Department of Labor records and reports which contain sensitive and confidential information regarding personal information, addresses, telephone and social security numbers, individual identifying information and information relevant to on-going investigations, and;

WHEREAS, counsel for the defendants have agreed, in return for disclosure of the said documents, to keep them confidential from all individuals, outside of their employed support personnel, including {00311712}

associates, paralegals, and clerical employees, their clients and any experts hired in relation to their client's defenses and to make no copy, either electronic or paper of the documents for any other individuals and;

WHEREAS, nothing in this Decree and Order shall prevent any party from using the information protected by this Decree and Order at Sentencing or as an exhibit or attachment to any motion, pleading, or other paper filed with the Court;

WHEREAS, the parties wish the Court to incorporate this consent agreement in an Order of Nondisclosure,

NOW THEREFORE, the undersigned counsel for the United States and for the defendants Samuel Borgia and Steven Borgia, agree and consent to an Order entered by this Honorable Court to prevent the disclosure and dissemination of documents provided to the defense pursuant to Rule 16 of the Federal Rules of Evidence, and further agree that counsel for the defendants may review the contents of said documents with their clients but may only make a copy of the documents for their clients and any hired expert for their client's

defense but not provide a copy of the same to any other person.

Dated this 1st day of June, 2017.

Bruce D. Bandler
United States Attorney

/s/ Evan Gotlob
Evan J. Gotlob
Assistant U.S. Attorney

/s/ Suzanne Conaboy Scanlon
Suzanne Conaboy Scanlon
Attorney for Steven Borgia

/s/ Gerard Karem
Gerard Karem
Attorney for Samuel Borgia

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Defendant :
:

ORDER

In accordance with the Consent Decree executed by the parties,
it is hereby Ordered as follows:

Counsel for the defendant shall prevent the disclosure and
dissemination of documents and information provided by the United
States of America pursuant to Rule 16 of the Federal Rules of Evidence.
Counsel may disclose the contents of said documents and information to
their clients and any experts hired in his client's defense, but may not
provide a copy of the same to any other person unless authorized by
Order of this court.

Dated this ____ day of _____, 2017

A. RICHARD CAPUTO
United States District Judge

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